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Attorneys for Defendants  
REPRO MEDIA and ARNO RUBEN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LEE LAHTINEN in his capacity as Trustee of the SAN FRANCISCO LITHOGRAPHERS PENSION TRUST,	) No. C06-04047 (MEJ)
	)
Plaintiff,	) <b>STIPULATION AND [PROPOSED]</b>
	) <b>ORDER CONTINUING CASE</b>
	) <b>MANAGEMENT CONFERENCE</b>
v.	)
	)
REPRO MEDIA, a California Corporation; ARNO RUBEN, individually and doing business as REPRO MEDIA; ARNO RUBEN, individually,	)
	)
Defendants.	)

Plaintiff Lee Lahtinen, in his capacity as Trustee of the San Francisco Lithographers Pension Trust ("Plaintiff"), and Defendants Repro Media, a California Corporation, Arno Ruben, individually and doing business as Repro Media, and Arno Ruben, individually ("Defendants"), through their respective counsel, hereby stipulate to and request that the Court continue the Initial Case Management Conference and related deadlines to September 13 or 20, 2007 at 10 a.m. in order to allow the parties time to continue and complete their discussions regarding a possible

1 resolution of this action without the necessity of further litigation time and expense.

2           1. Pursuant to the Court's Order Setting Initial Case Management Conference  
3 and ADR Deadlines, the Initial Case Management Conference in this action was set for September  
4 28, 2006. Pursuant to stipulation of the parties, on September 25, 2006 the Court issued an Order  
5 continuing the Initial Case Management Conference to December 21, 2006 in view of Defendants'  
6 very recent first appearance in the action and the parties' stated interest in exploring settlement  
7 through direct discussions. Pursuant to a subsequent stipulation of the parties, the Court on  
8 December 7, 2006 issued a further Order continuing the Initial Case Management Conference to  
9 March 22, 2007 in order to afford the parties additional time to explore settlement of their dispute.  
10 Pursuant to a further stipulation of the parties, the Court on March 13, 2007 issued a further Order  
11 continuing the Initial Case Management Conference to May 31, 2007.

12           2. At the time the parties requested the most recent continuance of the Initial  
13 Case Management Conference (to May 31, 2007), the parties anticipated that they might be able to  
14 conclude their settlement discussions before the compliance dates for case management-related  
15 activities. As of mid-March Defendants had provided certain information and documentation to  
16 Plaintiff, Plaintiff had requested supplemental information, and Defendants had furnished the  
17 requested information to Plaintiff, whose Board of Trustees was meeting at the end of March.  
18 However, following the Board of Trustees meeting Plaintiff requested supplemental financial  
19 information, which Defendants have just provided to Plaintiff's counsel and Plaintiff has not yet  
20 had time to evaluate.

21           3. On May 9, 2007 counsel for the parties conducted a telephone meet and  
22 confer regarding an ADR process and preparation of the case management statement and Rule  
23 26(f) report. In the course of their discussion of ADR it emerged that Plaintiff's counsel and her  
24 client will likely have additional questions for Defendants regarding the most recent information  
25 and documents provided to them before they will be in a position to discuss that information and a  
26 possible resolution of this action with Plaintiff's Board of Trustees. Answering further questions  
27 from Plaintiffs will likely require Defendants additional time to obtain information from their

1 outside accounting firm. The parties agree that the information that they are exchanging is also  
2 material to preparation for an ADR process should direct negotiations for a settlement fail.

3 4. The parties agree that additional time is needed to permit the further  
4 exchange of information and exploration of settlement. Counsel for the parties have discussed a  
5 possible continuance of the Initial Case Management Conference for a period of 60 to 90 days.  
6 However, due to scheduling of other matters, client availability and vacations, an August date for  
7 the continued Case Management Conference is not feasible. The parties believe that an extension  
8 of the conference date to September will afford them the time they need to continue and conclude  
9 informal discovery and direct discussions regarding a possible resolution of this action without the  
10 necessity of further litigation time and expense.

11 5. As noted above, there have been three previous continuations of the Initial  
12 Case Management Conference and related case management activities.

13 6. The parties expect that the requested extension of the date for the Initial  
14 Case Management Conference will have no adverse effect on the schedule for the case. No trial  
15 date or other deadlines have yet been set. The requested extension may facilitate the resolution of  
16 the parties' dispute, and will at a minimum enable the parties to exchange additional information  
17 about their respective positions that may streamline case management.

18 Therefore, Plaintiffs and Defendants, through their respective counsel, stipulate and  
19 agree as follows:

20 1. The Initial Case Management Conference date of May 31, 2007 and related  
21 deadlines are vacated.

22 2. The Initial Case Management Conference date is extended to September 13  
23 or 20, 2007 at 10:00 a.m.

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26 //

27 //

28 //

1                   3.     Related deadlines for ADR and case management activities are extended  
2 accordingly, as provided in the Court's Order Setting Initial Case Management Conference and  
3 ADR Deadlines.

4  
5 Dated:           May 9, 2007

6                   WEINBERG, ROGER & ROSENFELD  
7                   A Professional Corporation

8                   By: *Linda Baldwin Jones*  
9                   LINDA BALDWIN JONES  
                    Attorneys for Plaintiffs

10 Dated:           May \_\_, 2007

11                   LITTLER MENDELSON  
12                   A Professional Corporation

13                   By: \_\_\_\_\_  
14                   NANCY L. OBER  
                    Attorneys for Defendants

3. Related deadlines for ADR and case management activities are extended accordingly, as provided in the Court's Order Setting Initial Case Management Conference and ADR Deadlines.

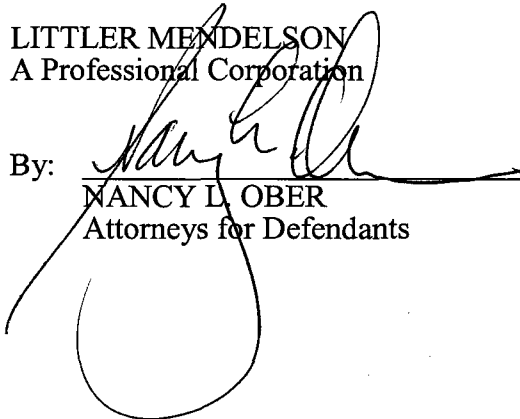
Dated: May \_\_, 2007

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: \_\_\_\_\_  
LINDA BALDWIN JONES  
Attorneys for Plaintiffs

Dated: May 9, 2007

LITTLER MENDELSON  
A Professional Corporation

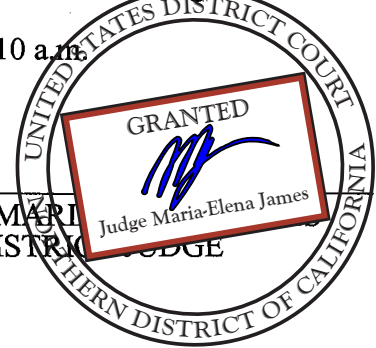
By:  \_\_\_\_\_  
NANCY D. OBER  
Attorneys for Defendants

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference in this matter is rescheduled to September 13, 2007 at 10 a.m.

Dated: May 30, 2007

THE HONORABLE MARI  
UNITED STATES DISTRICT JUDGE



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